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Attorney for Defendant  
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:22-cr-000151-WBS
	)	
Plaintiff,	)	STIPULATION AND ORDER TO
	)	CONTINUE STATUS CONFERENCE AND
v.	)	EXCLUDE TIME
	)	
JOSE CURIEL, ET AL	)	
	)	Date: August 28, 2023
Defendants.	)	Time: 9:00 a.m.
	)	
	)	

**IT IS HEREBY STIPULATED**, by and between the parties, through their respective counsel, Assistant United States Attorney Justin Lee, counsel for plaintiff, Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Curiel, and Clemente M. Jimenez, counsel for defendant Roberto Tostado-Cadenas, that the status conference scheduled for June 5, 2023, be continued to **August 28, 2023, at 9:00 a.m.**

Defense counsel continues to review discovery and conduct investigation in this case. The parties anticipate an initial plea offer from the government prior to the next status conference, and will require additional time to review the offer with the defendants and respond to the government. The parties believe a continuance to August 28, 2023, will permit defense counsel the additional time necessary to conduct pretrial investigation, identify and interview witnesses, obtain pertinent records, and engage in pre-plea negotiations.

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1           The parties agree that the ends of justice served by resetting the status conference date  
2 outweigh the best interest of the public and the defendant in a speedy trial. Therefore the parties  
3 agree that time is excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).  
4

5 Dated: June 1, 2023

Respectfully submitted,

6 HEATHER E. WILLIAMS  
7 Federal Public Defender

8 /s/ Megan T. Hopkins  
9 MEGAN T. HOPKINS  
Assistant Federal Defender  
Attorney for Defendant  
JOSE CURIEL

11 Dated: June 1, 2023

12 /s/ Clemente M. Jimenez  
13 CLEMENTE M. JIMENEZ  
Attorney for Defendant  
ROBERTO TOSTADO-CADENAS

14 PHILLIP A. TALBERT  
15 United States Attorney


16 Dated: June 1, 2023

17 /s/ Justin Lee  
18 JUSTIN LEE  
Assistant United States Attorney  
Attorney for Plaintiff

**ORDER**

**IT IS HEREBY ORDERED** that the preliminary hearing scheduled for June 5, 2023, at 9:00 a.m. is continued to **August 28, 2023, at 9:00 a.m.** The time period between through August 28, 2023, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: June 1, 2023

  
**WILLIAM B. SHUBB**  
**UNITED STATES DISTRICT JUDGE**